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8 **UNITED STATES DISTRICT COURT**
9 **EASTERN DISTRICT OF CALIFORNIA**

10
11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 CB SURETY LLC, et al.,
15 Defendants.

Case No. 2:23-cv-02812-TLN-DB
(Assigned to Hon. Troy L. Nunley)
**DECLARATION OF KENNETH
R. JONES IN SUPPORT OF
RECEIVER'S MOTION TO
SUBSTITUTE RECEIVER**
Date: October 2, 2025
Time: 2:00 p.m.
Crtrm: 2

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1 I, Kenneth R. Jones, declare as follows:

2 1. I have personal knowledge of the matters stated in this declaration and,
3 if called to do so, could and would competently testify thereto.

4 2. I am the Court appointed Receiver for the Receivership Entities in the
5 above-captioned matter.

6 3. I submit this declaration in support of the Receiver's Motion to
7 Substitute.

8 4. I have been offered and have accepted a position that will preclude me
9 from continuing in the capacity of the Receiver. I request the Court appoint a new
10 Receiver for the Receivership Entities in this matter and relieve me of my duties.

11 5. My new position will be Global Head of Fraud Risk for a large,
12 designated Global Systemically Important Banks ("G-SIB").

13 6. Very early in the selection process for this role, I directed a staff member
14 to provide me a list of banks known to be used by the Receivership Entities. From
15 that review, I determined that the G-SIB offering this role was not used by the
16 Receivership Entities in any manner related to this matter.

17 7. The Receiver's role in this matter remains active and includes measures
18 currently underway to secure significant amounts of Receivership Property for
19 preservation pursuant to the Court's January 5, 2024 Order. I will provide further
20 details of the Receivership's current activities in my upcoming interim status report
21 to the Court on August 29, 2025.

22 8. Throughout the Receivership, I have relied on support from Mr. Mark
23 Roberts. Mr. Roberts is a Managing Director at Alvarez & Marsal Restructuring &
24 Turnaround in Washington D.C. Mr. Roberts leads the Mid Atlantic Restructuring
25 practice for the organization and has significant experience as a receiver via both state
26 and federal appointments.

27 9. I recommend the Court appoint Mr. Roberts as the new Receiver for the
28 Receivership Entities. On August 21, 2025, I spoke with counsel for the United States

1 in this matter, who stated the United States did not oppose my request to substitute
2 Mr. Roberts as the Receiver in this matter.

3 10. A summary of Mr. Robers qualifications is attached hereto as **Exhibit**
4 **A.**

5 11. Pursuant to the Court's Order of January 5, 2024, I delegate primary
6 responsibility for the performance of duties and authorities granted by that Order to
7 Mr. Roberts, until such time as the Court appoints a new Receiver.

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9 I declare under the penalty of perjury of the laws of the United States of
10 America that the foregoing is true and correct.

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12 DATED this 27th day of August, 2025, at Christiansted, U.S. Virgin Islands.

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Kenneth R. Jones